

JONATHAN D. DAVIS, P.C.
ATTORNEYS AT LAW
10 ROCKEFELLER PLAZA
SUITE 1015
NEW YORK, NEW YORK 10020

TEL: (212) 687-5464
FAX: (212) 697-2521
WWW.JDDAVISPC.COM

October 14, 2021

VIA ECF

The Honorable Victor Marrero
United States District Court Judge
United States District Court
500 Pearl Street, Suite 1610
New York, New York 10007

Re: Nwosuocha v. Glover, et al. (Civ. Action No. 21-cv-04047)

Dear Judge Marrero:

We are the attorneys for Defendant Donald McKinley Glover, II in the above-referenced action as well as counsel for nine other defendants for the limited purpose of entering into the accompanying stipulation concerning defendants' time to respond to the Complaint, which is the subject of this letter. Counsel has not yet been engaged for those nine defendants.

We respectfully request that your Honor "so order" the attached stipulation entered into between Plaintiff and the designated defendants (the "Stipulating Defendants"), which establishes December 8, 2021, as the single response date for all but one of the 13 defendants named in the Complaint. After discussions with the legal representative for the remaining defendant, Jefferey Lamar Williams, who has not been served, it is anticipated that he will accept service of the Summons and Complaint and join the response date agreed to by all the other defendants.

As set out in the parties' stipulation, the Stipulating Defendants have agreed not to contest service of process in exchange for establishing December 8, 2021, as the date to respond to the Complaint. Plaintiff acknowledges that he will save considerable time and expense by entering into the stipulation. This is the parties' first request concerning the response to the Complaint.

The Honorable Victor Marrero
October 14, 2021
Page 2

We thank the Court in advance for its consideration of this letter and stipulation.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

JDD:hs
Attachment

cc: Imran H. Ansari, Esq. (Via ECF)
Allen Grodsky, Esq. (Via Email)
Alex Spiro, Esq. (Via ECF)
Paul Brian Maslo, Esq. (Via ECF)